

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re : Chapter 9  
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CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
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Debtor. : Hon. Steven W. Rhodes  
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**CITY OF DETROIT'S STATEMENT REGARDING THE RETIREE  
ASSOCIATION PARTIES' DESIGNATION OF THE CONTENTS OF  
THE RECORD AND STATEMENT OF ISSUES ON APPEAL**

The City of Detroit (“City”) is the Debtor in this chapter 9 case and appellee with respect to the *Notice of Appeal* filed by the Retired Detroit Police & Fire Fighters Association (“RDPFFA”), Donald Taylor, individually and as President of the RDPFFA, the Detroit Retired City Employees Association (“DRCEA”), and Shirley V. Lightsey, individually and as President of the DRCEA (collectively, the “Retiree Association Parties”) [Docket No. 2070] to challenge the Court’s *Opinion Regarding Eligibility* [Docket No. 1945] and *Order for Relief Under Chapter 9 of the Bankruptcy Code* [Docket No. 1946]. The City states that it filed its counter-designation of the record and counter-statement of the issues pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure in response to the *Designation by*

*Retiree Association Parties of Record on Appeal* [Docket No. 2300] and the  
*Statement by Retiree Association Parties of Issues on Appeal* [Docket No. 2301] on  
January 2, 2014, at Docket No. 2361, which is incorporated herein by reference.

Dated: January 6, 2014

Respectfully submitted,

/s/ David G. Heiman

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ATTORNEYS FOR THE CITY

## **Certificate of Service**

I, David G. Heiman, hereby certify that the foregoing **CITY OF DETROIT'S STATEMENT REGARDING THE RETIREE ASSOCIATION PARTIES' DESIGNATION OF THE CONTENTS OF THE RECORD AND STATEMENT OF ISSUES ON APPEAL** was filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this manner on this 6th day of January 2014.

/s/ David G. Heiman

David G. Heiman